

Brown, Ethan

From: Brown, Ethan
Sent: Wednesday, June 5, 2019 4:24 PM
To: Martin, Kristen
Cc: Payton, Richard; Dobrahner, Jaslyn; Ulrich, Liz; Ackerlund, Julie
Subject: Re: Initial Notification of PM2.5 Libby EE

Hello Kristen,

Thank you for the initial notification of the intent to demonstrate that the attached PM_{2.5} data have been impacted by wildfire smoke and should therefore be excluded when determining whether the area is eligible for a Limited Maintenance Plan (LMP) option. The Clarification Memo (https://www.epa.gov/sites/production/files/2019-04/documents/clarification_memo_on_data_modification_methods.pdf) states that we are to treat these data in a manner analogous to exceptional events (EE) under the Exceptional Events Rule (EER), and this initial notification satisfies one of the procedural requirements outlined in the EER.

Because Libby is currently attaining the 1997 annual NAAQS (15 µg/m³), is designated an attainment area under the other current PM_{2.5} NAAQS, and the EPA has no current plans to redesignate areas under those NAAQS, these data have no regulatory significance as defined under the EER. Regardless, the Clarification Memo states that current LMP guidance allows data influenced by exceptional events to be excluded when determining LMP eligibility. If successfully demonstrated, these data will be excluded when determining eligibility for an LMP option but will remain as-is in AQS for all other purposes.

Unlike the PM₁₀ LMP option, there is no current guidance on a PM_{2.5} LMP option. As a result, there is no established PM_{2.5} threshold value which the data must exceed before being considered for exclusion. Since the data included in this initial notification are above the applicable NAAQS (15 µg/m³ annual average), we feel they also fall above any future threshold that may be established.

Please feel to contact us with any questions you may have while you prepare the demonstration.

Regards,

Ethan Brown
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From: Martin, Kristen <KMartin@mt.gov>
Sent: Friday, May 24, 2019 11:38 AM
To: Payton, Richard <Payton.Richard@epa.gov>; Dobrahner, Jaslyn <Dobrahner.Jaslyn@epa.gov>
Cc: eulrich2@mt.gov; Ackerlund, Julie <JAckerlund@mt.gov>
Subject: Initial Notification of PM2.5 Libby EE

Hello Richard,

This email is to notify you of our intention to submit an Exceptional Events Package. Below is a summary of the data we would like to submit and why. We look forward to working with EPA on this submittal.

Where and When: Libby, MT in summer 2018

Pollutant: PM_{2.5}

Cause: The 2018 wildfire season was defined by transported smoke from Canada and numerous fires in northwest Montana causing smoke impacts to nearby communities. In Libby, smoke caused exceedances of the National Ambient Air Quality Standards (NAAQS) throughout August.

Regulatory Significance: MT DEQ is currently working to redesignate the Libby PM_{2.5} Nonattainment Area (Annual Standard). Removing wildfire impacted days above 35 µg/m³ will likely be required to qualify for a Limited Maintenance Plan. Events from 2014-2017 have already been submitted in previous EE demonstrations.

Dates:

Date	Site	AQS #	24-hour PM _{2.5} (µg/m ³)
8/8/2018	Libby	30-053-0018	37.2
8/9/2018	Libby	30-053-0018	36.9
8/10/2018	Libby	30-053-0018	41.2
8/11/2018	Libby	30-053-0018	37.5
8/12/2018	Libby	30-053-0018	40.3
8/13/2018	Libby	30-053-0018	70.5
8/14/2018	Libby	30-053-0018	86.2
8/15/2018	Libby	30-053-0018	69.7
8/16/2018	Libby	30-053-0018	63.2
8/17/2018	Libby	30-053-0018	64.7
8/18/2018	Libby	30-053-0018	69.2
8/19/2018	Libby	30-053-0018	105.6
8/20/2018	Libby	30-053-0018	65.5
8/22/2018	Libby	30-053-0018	53.4
8/23/2018	Libby	30-053-0018	83.0
8/24/2018	Libby	30-053-0018	81.2
8/25/2018	Libby	30-053-0018	67.8
8/26/2018	Libby	30-053-0018	55.8

Please let me know if I can provide additional information.

Thank you,

Kristen

Kristen Martin, Air Quality Meteorologist
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